



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243-1102

February 1, 2016

Honorable Dennis Webb, Mayor  
Town of Bell Buckle  
e-copy: [cityofbellbuckle@yahoo.com](mailto:cityofbellbuckle@yahoo.com)  
PO Box 276  
Bell Buckle, TN 37020

Subject: **Town of Bell Buckle**  
**County: Bedford**  
**Wastewater Project Numbers: 16-0045 and 16-0046**  
**Management, Operations and Maintenance (MOM) Program and**  
**Technical Memorandum - Corrective Action Plan Revision**

Dear Mayor Webb:

The Tennessee Department of Environment and Conservation, Division of Water Resources (division), acknowledges the receipt of two documents on November 16, 2015. Division review of the documents, in conjunction with other documents from your file record, leads the division to conclude that efforts to eliminate inflow and infiltration to date have not been effective and that the programs being used to address inflow and infiltration reduction are deficient in terms of documentation and quantification. The above documents appear to be related, by inference, to a Director's Order No. 05021D issued on March 29, 2005.

An Order is issued to a discharger to remedy unlawful acts associated with their method of operating a sewerage system and/or discharging from it. Specifically in this case, the order required remedy for the frequency of passes/overflows in the collection system. This Order identified 61 instances of pass/overflow as a violation of our state regulations during the thirteen (13) month period of January 2004 to January 2005. The Order required the Town of Bell Buckle to submit (1) a corrective action plan (CAP) with milestones, (2) a Management, Operations and Maintenance (MOM) program listing major goals of the program and (3) annual reports through 2011 summarizing the implementation and effectiveness of the MOM.

The MOM program initiated by the Order has not reduced the number of bypasses/overflows as documented in the submittal itself. Our review of the two subject documents included the review of the current NPDES permit, TN0020591, which is Item 1 of Appendix A of the MOM. The permit includes a summary of effluent characterization. In Appendix 2 of the permit there are two hundred and sixty-six (266) bypass/overflow occurrences between October 2008 and December 2013 including ninety (90) in the year 2013. The report draws conclusions from 6 months of discharge monitoring data for two consecutive calendar years. Weather patterns vary year by year, so this is insufficient data to document a trend. Additionally, influent flow data is used by operators to regulate the treatment process and is generally not intended to represent system-wide hydraulics.

An effective program is an evidence-based program that includes planning, design, implementation and follow up monitoring and evaluation. The Year 6, 2010 MOM Annual Report does not reflect this methodology but rather makes statements like:

- Some manhole inspections have been completed.
- Some homeowners have been required to fix service line deficiencies. and
- Some grease trap inspections have been completed.

Design, operation, maintenance and follow-up evaluation of infrastructure to perform as designed are within the jurisdiction of registered professionals who are in business to provide engineering services. Because such firms provide only scopes of services they are paid to perform, the objective when securing such services needs to be effecting and documenting the owner's commitment to ongoing system maintenance and capacity management.

Neither submitted document provided the elements listed in the 2005 Order (Refer Section X, parts 1 and 5 of the Order). These elements include for;

The CAP must include engineering report to identify causes and propose solution necessary to meet NPDES permit including collection system infiltration and inflow and collection system overflows.

The MOM must include goals to meet the NPDES permit listing resources, develop effective procedures and training

The division appreciates Bell Buckles recognition of its inflow and infiltration problem and its continued interest in addressing it. We look forward to continued working with you in the future.

To expedite matters, please reference the assigned wastewater project number 16-0046 on any future correspondence. If you have any questions, please feel free to contact Mr. Jim McAdoo at (615) 532-0684 or by E-mail at [Jim.McAdoo@tn.gov](mailto:Jim.McAdoo@tn.gov).

Sincerely,



Vojin Janjić  
Manager, Water-Based Systems

cc: Ms Jenny Hunt, Vice Mayor, Town of Bell Buckle, [cityofbellbuckle@yahoo.com](mailto:cityofbellbuckle@yahoo.com)  
Ms Sherry Glass, Environmental Program Manager, Columbia Environmental Field Office  
Ms Jessica Murphy, Manager Enforcement and Compliance  
Water-Based Systems File